

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

RUSSELL STEWART,)	
)	
Plaintiffs,)	Civ. No. 04-1200-SLR
)	
v.)	
)	
STATE OF DELAWARE, _____))	
DEPARTMENT OF PUBLIC SAFETY, _____))	
CAPITOL POLICE, _____))	
_____))	
Defendant _____))	

PLAINTIFF'S ANSWERS TO FORM 30 INTERROGATORIES

1. Identify by name, address, and telephone number all persons with knowledge of the facts as to each allegation as set out in your most recent complaint and identify those persons that have been interviewed on your behalf and as to the interview, state: the date, the location, the subject matter and any documents discussed, identified or provided by that person.

ANSWER:

Russell Stewart

Tasha Johnson-Department of Public Safety, Dover, DE 19904

Sgt. Kasner- 800 N. French Street, Wilmington, DE 19801

Officer Booker

2. Identify each and all documents or other items of evidence that you intend to use in this lawsuit, for any purpose, including, but not limited to cross-examination, during any pre-trial or trial proceedings.

ANSWER:

Letter saying that Plaintiff was certified for position

Employment record showing already working security and passed a background check

3. For each allegation you are presenting in this matter, state with particularity and specificity the complete factual basis for each allegation and identify all persons having knowledge as well as each and all documents or other items of evidence in your possession that relate to each claim.

ANSWER:

Letter saying that he was qualified

Tasha Johnson's statement of being on certification list

Employment record showing qualifications

Sgt. Booker's statement saying all interviewees were white

Position Qualifications

4. State and identify by names of parties, court or administrative body and case number all lawsuits or legal proceedings, at law or equity, civil or criminal, of any nature (other than routine traffic tickets) in which you were a party and the disposition of that matter.

ANSWER:

None

5. Identify each and all photographs, videotapes, audio tapes or any other form of recording media that relate to this matter, and state the time, date, location and manner that such were made as well as the names of all individuals that have the originals or copies.

ANSWER:

None

6. State and describe by amount and source all funds provided to you for the last five

years and include the dates you first started receiving such funds and the reasons the funds are provided to you.

ANSWER:

Objected to on the grounds that it is overly broad.

7. State and describe any efforts you have undertaken to seek or gain employment or other source of remuneration for the last ten years.

ANSWER:

For the last ten years Plaintiff has been employed. See Next question for employment history

8. Regarding your employment history, list in chronological order the names of all of your employers, location of the job, position or duties of position, wage or salary, and inclusive periods of such employment to the present time.

ANSWER:

2002-Present-- Capitol Police at Justice of the Peace Court #20-Capitol Security Guard--enforcing law and order to the state facility

2001-2002-- Lockheed Martin-Security Officer--enforced law and order on the Naval Base

1999-2001-- Naval Support Center-Security Police--enforced law and order on the compound

1985-1995-- Philadelphia Housing Authority--Police Officer- enforced law and order for the State's Attorney's Office

9. List in chronological order all of your formal education. Please include the name, address and telephone number of each educational institution or school, the dates of your

attendance and the degree(s) awarded.

ANSWER:

1976- GED

March 1981- Completed Basic Police Training given by the Police Department of the Navy

April 1981- Completed Special Weapon Training for the Philadelphia Police Department

October 1989- Completed Auto Theft Investigation at Pennsylvania Auto Crime Investigators Association

July 1990- Completed Semi-AutoMatic Weapons Training at the Philadelphia Law Enforcement Training Academy

August 1991- Completed US Marshal training at the Building Entry Techniques Seminar

January 1992- Certified Compliance with the Standard for Municipal Police Officers

May 1992- Completed Basic 40 Hour Drug Course

May 1992- Completed Polytesting Narcotics Screening and & Identification Training

August 1992- Completed US Marshal training at the Building Entry Techniques Seminar

September 1992- Was a role player for US Marshal Building Entry Techniques seminar

December 1992- Completed Building Entry Techniques Seminar for National Association of Chiefs of Police

July 1993- Completed US Marshal training at the Semi Automatic Transitional Program

October 1993- Completed Transitional Firearms Training for the National Association of Chiefs of Police

October 1993- Completed Building Entry Techniques Seminar for National Association of Chiefs of Police

June 1997- Completed Lethal Weapon Training

10. State and describe your employment status with the Delaware Department of Public Safety.

ANSWER:

Currently working at Justice of the Peace Court #20 as a Capitol Guard

11. List in chronological order all incidents in which you were discriminated against by the Defendant and include the nature of the discrimination and indicate your resultant damage.

Please include the dates, times, location and names of individuals with knowledge regarding such incidents of discrimination.

ANSWER:

3/19/03 Plaintiff was not given an interview even though he was qualified for the job. He had to take a lower paying job at the Justice of the Peace Court instead of that job which would have been a promotion to Capitol Police Officer III

12. If you claim that others, not in your protected class, were treated more favorably than you by the Defendant, please identify those employees you claim were treated more favorably. Please include the dates, times, location and names of individuals with knowledge regarding all such incidents of more favorable treatment and indicate your resultant damage.

ANSWER:

Darrell Harvey was hired and he was not qualified for the position.

/s/ R. Stokes Nolte

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Date: 3/30/05